DANIEL G. BOGDEN 1 United States Attorney District of Nevada 2 ALLISON L. HERR Special Assistant United States Attorney 3 333 Las Vegas Boulevard South Suite 5000 4 Las Vegas, Nevada 89101 702-388-6336 5 UNITED STATES DISTRICT COURT 6 DISTRICT OF NEVADA -oOo-7 UNITED STATES OF AMERICA, 8 Case No.: 2:14-cr-00178-JAD-GWF Plaintiff, 9 STIPULATION TO CONTINUE MOTION DEADLINES AND HEARING VS. 10 (7th request) IAN PINCOMBE, 11 Defendants. 12 13 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel Bogden, United 14 States Attorney; Allison L. Herr, Special Assistant United States Attorney, counsel for the 15 United States of America and Jennifer Waldo, Esq., counsel for defendant Ian Pincombe, that 16 time for the filing of the Defendant Reply shall be extended to August 10, 2015, and hearing 17 currently scheduled for July 27, 2015 at 1:30 pm be continued for a period of 30 days. 18 This Stipulation is entered into for the following reasons: 19 The parties are in the midst of plea negotiations, which if successful would 1. 20 obviate the need for the hearing. These negotiations however have been complicated by certain 21 disputes over the factual averments to which the Defendant will be pleading requiring time to 22 research and negotiate language for the same. 23 24

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1	2.	The additional time requeste	ed is not sought for the purposes of delay, but to	
2	allow counsel sufficient time to complete negotiations.			
3	3. The parties agree to the continuance.			
4	4. The defendant is in custody and does not object to a short continuance.			
5	5.	Denial of this request could	result in a miscarriage of justice. The additional	
6	time requested by this Stipulation is excludable in computing the time within which the tria			
7	herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code			
8	§3161(h)(7)(A), considering the factors under Title 18, United States Code §3161(h)(7)(B) and			
9	§ 3161(h)(7)(B)(iv).			
10	6.	This is the <u>seventh</u> request to	continue the hearing.	
11	DATED this 23rd day of July, 2015.			
12	DANIEL G. BOGDEN United States Attorney		JENNIFER WALDO Attorney for Defendant	
13			Attorney for Defendant	
14	Pyr /s/ Allicon	n Harr	Pyr /s/ Jappifor Woldo	
15	By: /s/ Allison Herr ALLISON L. HERR Special Assistant United States Attorney		By: /s/ Jennifer Waldo JENNIFER WALDO	
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## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,  Plaintiff,	) Case No.: 2:14-cr-00178-JAD-GWF	
vs.	FINDINGS OF FACT, CONCLUSION OF LAW AND ORDER	
IAN PINCOMBE,	) )	
Defendants.	)	

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court hereby finds that:

- 1. The parties are in the midst of plea negotiations, which if successful would obviate the need for the hearing. These negotiations however have been complicated by certain disputes over the factual averments to which the Defendant will be pleading requiring time to research and negotiate language for the same.
- 2. The additional time requested is not sought for the purposes of delay, but to allow counsel sufficient time to complete negotiations.
  - 3. The parties agree to the continuance.
  - 4. The defendant is in custody and does not object to a short continuance.
- 5. Denial of this request could result in a miscarriage of justice. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code §3161(h)(7)(A), considering the factors under Title 18, United States Code §3161(h)(7)(B) and §3161(h)(7)(B)(iv).
  - 6. This is the seventh request to continue the hearing.

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1	THEREFORE, IT IS HEREBY ORDERED that the deadline for the filing of the
2	Defendant's Reply shall be extended to August 10, 2015;
3	IT IS FURTHER ORDERED that hearing currently scheduled for July 27, 2015 at 1:30
4	pm is vacated and continued for a period of 30 days to Monday, August 31, 2015 at 1:30 pm
5	DATED this 23rd day of, 2015.
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7	Jeorge Foley Jr.
8	GEÖRGEFOLEY, JR. United States Magistrate Judge
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